

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

OMAR MAANI,

Defendant.

No. 20 CR 575

District Judge John R. Blakey

**DEFENDANT’S UNOPPOSED MOTION TO MODIFY CONDITIONS OF BOND**

Defendant Omar Maani, through undersigned counsel, submits the following unopposed motion to modify the conditions of his bond in order to permit him to travel with his family to the island of Aruba from March 26 through April 2, 2023.

1. Mr. Maani was released on a \$10,000 unsecured personal recognizance bond on September 4, 2020, with conditions that he submit to supervision by Pretrial Services. No travel restrictions were noted on the defendant’s appearance bond.
2. Mr. Maani would like to take his family to the island of Aruba from March 26 through April 2, 2023.
3. The government, by AUSA Tiffany Ardam, has no objection to this application.
4. Pretrial Services has advised that they have no objection to this application.
5. If approved, Mr. Maani would supply Pretrial Services with a detailed itinerary of his trip, including hotel and flight information.

WHEREFORE, defendant Omar Maani respectfully moves for the Court to enter an Order modifying the conditions of his release so as to permit him to travel to the island of Aruba from March 26 through April 2, 2023.

Respectfully submitted,

/s/ Jeffrey H. Lichtman  
Jeffrey H. Lichtman

Law Offices of Jeffrey Lichtman  
11 E. 44<sup>th</sup> Street, Ste. 501  
New York, New York 10017  
Ph: (212) 581-1001  
Email: JHL@jeffreylightman.com

Attorneys for Omar Maani

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of January 2023, I electronically filed the

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF HIS BOND, with the

Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

AUSA Tiffany Ardam  
Office of the United States Attorney  
219 S. Dearborn, 5<sup>th</sup> Floor  
Chicago, IL 60604

U.S. Pretrial Services  
219 S. Dearborn, Room 15100  
Chicago, IL 60604

and hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: none.

/s/ Jeffrey H. Lichtman  
Jeffrey H. Lichtman

Law Offices of Jeffrey Lichtman  
11 E. 44<sup>th</sup> Street, Ste. 501  
New York, New York 10017  
Ph: (212) 581-1001  
Email: JHL@jeffreylightman.com

Attorneys for Omar Maani